



BUFORD MEDIA GROUP, L.L.C.

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April 18, 2005

KAY MONIGOLD

President

Chief Operating Officer

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

via electronic filing

Re: American Cable Association Petition for Rulemaking, RM-11203

Dear Ms. Dortch:

On behalf of Buford Media Group and its family of companies, Alliance and Allegiance Communications, I write to express our strongest support for ACA's petition for rulemaking on retransmission consent. I operate an independent cable company that serves customers in smaller, rural areas, and I can verify that the petition accurately describes the upcoming retransmission consent crisis. Broadcasters, including those in my markets, have made it clear that they will force us to charge an additional \$5 to \$6 per subscriber per month for basic cable, to cover new demands of cash for carriage. ACA's solution to this problem is pro-competition, pro-consumer, and deregulatory. It will benefit the consumers served by my company and will help keep down the costs of basic cable.

Provided below is some information about my company and why we think the Commission needs to grant ACA's petition.

Company background

Our company is privately owned and began providing cable service in 1999. We operate seventy nine headends serving a total of 55,000 customers in rural Kansas, Oklahoma, Missouri, Arkansas, Mississippi, Texas, Mississippi, and Texas. Our largest system is 6,700 customers and our smallest system is 100.

We have invested in upgrading our systems, have launched digital cable, and began offering broadband in our largest system several years ago. DBS competition has been a strong competitor in our markets, taking subscribers and making it difficult to increase rates. At the same time, programming costs have increased far ahead of inflation. I estimate that programming costs have increased by more than 10% per year for the last five years.

The broadcasters' demands for several more dollars per month presents a major problem. Additionally, network owners and affiliates groups have and will continue to use retransmission consent to gain carriage of affiliate programming on our systems. Often these new niche channels are of no interest to our subscribers and create no value. Additionally, our customers feel like they had no choice in the selection of these channels. For example, three years ago, ABC was negotiating for carriage of Disney. FOX was demanding carriage of National Geographic. And on and on. Broadcasters have already approached me with demands of \$0.50 or more per subscriber per month in the next round. Because our margins are already stretched thin, we have no choice but to pass this cost onto our customers. They will be angry. Some will drop our service. Those that do not will have to pay up to several dollars more for basic cable.

Why we support ACA's Petition

Basically, all that ACA asks for is a right for us to shop and only when a broadcaster demands a price for retransmission consent. In my markets, I know this will work to lower the cost of retransmission consent for my customers.

First, I know that I could obtain network programming at a lower cost from other broadcasters. I can do this by receiving signals from neighboring markets.

Second, if the broadcasters in my market know alternatives exist, I am confident I will be able to negotiate a lower price. That works in every type of transaction, and it will work in retransmission consent.

As stated in the petition, the problem is not that broadcasters demand a "price" for retransmission consent. The problem is that they block our ability to find lower-cost alternatives. The petition shows how this problem will easily cost consumers and smaller cable operators upwards of \$1 billion next year. In my markets, broadcaster's demands could cost my company and our subscribers at least \$ 1,300.000 per year. **This is unacceptable.**

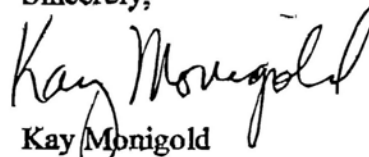
By making the limited changes requested by ACA, the Commission will bring some market discipline to retransmission consent "pricing." This will help to keep our costs down and will benefit our consumers.

Our concern for localism

As a final point, I want the Commission to know that we support local broadcasting and prefer to carry our local broadcasters. We understand the importance of local programming, but we also understand how much our customers are willing to pay for it. The problem is the higher prices being demanded by more and more owners of these stations. Most often the owners are based in corporate headquarters hundreds or thousands of miles away. Frankly, they don't care about localism. They just want our customers' money.

We fully support a fair exchange of value for carriage of local signals. But when broadcasters demand a "price," we need the ability to "shop" to get a "price" that fairly reflects the value of the signal. Please act on ACA's Petition as soon as you can.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Monigold". The signature is fluid and cursive, with the first name "Kay" and last name "Monigold" clearly distinguishable.

Kay Monigold
President & COO